

REMARKS

The Examiner has rejected Claims 1-27 under 35 U.S.C. 103(a) as being unpatentable over Michael J. Bender & Slobodan P. Simonovic (hereinafter referred to as "Bender et al."), "A System Approach for Collaborative Decision Support in Water Resources Planning" IEEE, 1996, in view of Steve Glickman, "Interpreting Business Assessment Results," June 8, 1998. Applicant respectfully disagrees with such rejection, especially in view of the amendments set forth hereinabove. Specifically, applicant has amended each of the independent claims to include the subject matter of former dependent Claim 2 and 8 et al.

In the most recent action, the Examiner has relied upon Bender to make a prior art showing of all of the subject matter of the independent claims, with the exception of applicant's claimed "generating a tornado diagram." Such application of Bender, however, is replete with deficiencies.

Just by way of example, simply nowhere in Bender is it disclosed, taught, or even suggested that "a strategy table [is created] using the data." Still yet, Bender is lacking of even a suggestion of "generating ... decision sensitivity output displays." Only applicant teaches and claims such creation of a "strategy table" specifically using the data, as claimed, as well as "decision sensitivity output displays," as claimed.

More importantly, it appears that the Examiner has overlooked applicant's claimed "wherein (a)-(d) are carried out by a collaborative decision platform capable of accomplishing (b)-(d) for different purposes by executing different applications each capable of performing different decision logic." It is noted that Bender merely suggests a framework specifically adapted for collaborative decision support in water resource planning only.

In sharp contrast, applicant's framework is adapted for convenient use and re-use for different purposes. Specifically, this is accomplished "wherein (a)-(d) are carried out by a collaborative decision platform capable of accomplishing (b)-(d) for different purposes by executing different applications each capable of performing different decision logic." Only applicant teaches and claims such a universal platform capable of executing different applications for accomplishing different purposes using different decision logic.

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To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir.1991).

Applicant respectfully asserts that at least the third element of the *prima facie* case of obviousness has not been met, since the references, when combined, fail to teach or suggest all the claim limitations.

Nevertheless, in the spirit of expediting the prosecution of the present application, applicant has amended each of the independent claims to require:

"an application interface provides an interface between the application and the collaborative decision platform, where (b)-(d) are carried out using universal modules capable of interfacing with different applications adapted for applying the universal modules to different business sectors" and

"wherein the collaborative decision platform communicates with the application through a standard interface protocol" or similar language.

Simply nowhere in Bender is there any sort of application interface that provides an interface between an application and the collaborative decision platform, so that the various techniques of the present invention are carried out using universal modules, and different applications can apply the universal modules to different business sectors. A specific prior art showing of the foregoing limitations, in combination with the remaining claim elements, or a notice of allowance is respectfully requested.

It is further noted that the Examiner has simply dismissed applicant's dependent claims since they allegedly add no novelty. Applicant respectfully disagrees with this assertion with respect to all of the dependent claims.

Just by way of example, simply nowhere in the Examiner's proposed combination is there any sort of:

"collecting the data from the decision logic for generating visual displays of a decision hierarchy and an influence diagram" (see Claim 6 et al.);

"wherein the user is prompted to approve the visual displays of the decision hierarchy and the influence diagram" (see Claim 7 et al.);

"wherein each column heading in the strategy table includes a strategic decision from a decision hierarchy with alternatives for a decision arranged therebeneath" (see Claim 10 et al.);

"wherein the tornado diagram identifies sources of significant risk in each of a plurality of alternative strategies and the decision sensitivity output displays identify sources of significant value in each of the alternative strategies" (see Claim 11 et al.); and

"defining a minimum set of attributes; receiving first information regarding each of the minimum set of attributes from a receiving business; receiving second information regarding proposed products or services in terms of the minimum set of attributes, wherein the second information is received from a supplying business; executing a decision process based on the first information and the second information as to which products or services is suitable for the receiving business" (see Claim 12 et al.).

To further distinguish the presently claimed invention, applicant has further amended the claims to further emphasize the following features which are believed to be novel:

"wherein the business sectors include real estate, medicine, corporate, and financial" (see Claim 2).

A specific prior art showing of the foregoing limitations, in combination with the remaining claim elements, or a notice of allowance is respectfully requested.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. For payment of the fees due in connection with the filing of this paper, the Commissioner is authorized to charge such fees to Deposit Account No. 50-1351 (Order No. STRATP001).

Respectfully submitted,
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